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UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA and  
NEW YORK STATE *ex rel.* ORLANDO LEE,  
MELVILLE LUCKIE and LUZ GONZALEZ,

Plaintiffs/Relators,

- against -

NORTHERN ADULT DAILY HEALTH CARE  
CENTER and GALENA DEVERMAN,

Defendants.

**NOTICE OF MOTION**  
Civ. No. CV 13-4933 (MKB)

PLEASE TAKE NOTICE that upon the attached memorandum of law and declaration of  
Robert W. Sadowski, Plaintiffs/Relators will move this Court, Judge Margo K. Brodie, 225

Cadman Plaza East, Brooklyn, New York 11201 at Courtroom 6F, on a day to be determined by this Court, granting Plaintiffs/Relators' an alternate remedies award pursuant to 31 U.S.C. § 3730(d), the Federal False Claims Act, and New York State Finance Law § 190(5)(c), the New York False Claims Act.

Dated: New York, New York  
July 27, 2015

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*ex rel.* Orlando Lee

By:

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